

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Copac, Inc.,)	
)	
Plaintiff,)	PLAINTIFF'S ANSWERS TO RULE 26.01
)	INTERROGATORIES
v.)	
)	
Transperfect, Inc.,)	C.A. NO.: 7:11 – 1392 - TMC
)	
Defendant.)	
_____)	

Pursuant to Rule 26.01, Plaintiff, Copac, Inc., answers the Local Rule Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have subrogation interest in each claim and state the basis and extent of said interest.

Response: Plaintiff is not aware of any subrogation claim related to this lawsuit.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Response: All claims should be tried to a jury because of the jury trial demand of Plaintiff. There are factual issues for the jury to determine in this case.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Response: Plaintiff is not a public entity and is not owned or affiliated with a public entity.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Response: The Complaint was filed in Spartanburg County State Court, which is located within the Federal District Court to which Defendant removed the case. Diversity jurisdiction was the basis for Defendant's removal.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or event; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Response: Plaintiff is not aware of any related action.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Response: Not applicable.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Response: Not applicable.

THE WARD LAW FIRM, P.A.
Attorneys for Plaintiff, Copac, Inc.

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